

21 MR. STOKES: I am Heber Stokes. I am a Lemhi
22 County Commissioner. This is our official Lemhi County
23 comments on the DEIS on the grizzly bear recovery and
24 proposed special Rule 10(J). I don't have time to read
25 it all. Commissioner Chaffin is going to do one half

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1 and I will do the first half.

2 The following comments are submitted by the
3 Board of County Commissioners, Lemhi County, Idaho, for
4 consideration in reaching a decision on the proposal to
5 import and release grizzly bears, as outlined in the
6 Draft Environmental Impact Statement of July 1997.
7 These comments also pertain to the proposed 10(J) rule,
8 which is an integral part of the preferred alternative
9 described in the DEIS.

10 As the local elected and governing body for
11 Lemhi County, the county commissioners have a direct and
12 vital interest in the matter under consideration.
13 County responsibilities include the safety, health, and
14 welfare of the citizens as well as a keen interest in
15 the natural resources and wildlife of our area.

16 A huge portion of the proposed recovery area
17 and experimental population area lies within Lemhi
18 County and includes not only federally administered
19 lands but vast areas of private land occupied by
20 residents. Alternative 1, or any of the other action
21 alternatives, poses a high probability of serious
22 detrimental effects on the county and residents. In
23 addition, the lack of a specific and practical
24 management program for released bears and their
25 offspring places the animals in a high risk situation as

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1 well.

2 Lemhi County has been a leader in the State of
3 Idaho in developing common sense and energetic
4 on-the-ground programs and actions to aid the recovery
5 of endangered or threatened species once common to our
6 area. The model watershed program and the
7 multi-organization and agency programs such as the
8 riparian habitat agreement are prime examples of the
9 good things that can be accomplished when the federal
10 government is willing to work with people.

11 Unfortunately, for several years the grizzly
12 bear program has ignored requests from the county to
13 meet and has failed to reply to correspondence on the

14 matter. The DEIS states that the U.S. Fish & Wildlife
15 Service met with all the county commissioners in
16 adjacent counties, but that was before the introduction
17 area changed. Lemhi County Commissioners have never had
18 a meeting.

19 Most recently, the EIS coordinator would not
20 accept certified mail from the county containing a
21 Freedom of Information Act request. We did receive a
22 packet of information from the Denver office of the U.S.
23 Fish & Wildlife Service. This packet was reported to be
24 the complete study of the grizzly bear reintroduction
25 area. There is no study on the area south of the Salmon

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1 River or in the Frank Church.

2 In the packet of information there were
3 letters from the National Wildlife Federation and
4 Alliance for the Wild Rockies to Chris Servheen stating
5 that they were answering his letters, but there were no
6 letters from Chris Servheen to those agencies. The
7 letters to Chris Servheen from these agencies were
8 quoted almost verbatim in the DEIS.

9 With this background, we offer the following
10 specific comments:

- 11 The preferred alternative and other action
- 12 alternatives are biologically flawed. No analysis of
- 13 the vegetative characteristics, habitat components and
- 14 so forth for the recovery area exists. The analysis
- 15 work that has been performed and documented covers only
- 16 part of the proposed recovery area, and the proposed
- 17 recovery area excludes significant habitat. In other
- 18 words, the analysis and proposal do not correspond and
- 19 this constitutes a major violation of NEPA. If the
- 20 packet of information we received from the U.S. Fish &
21 Wildlife Service was everything that has been studied as
22 proclaimed, then the printing of the DEIS has to be
23 illegal, because there is no study of the area south of
24 the Salmon River or the new grizzly bear reintroduction
25 area.

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1 No. 2, the addition of the Frank Church-River
2 of No Return Wilderness to the proposed recovery area
3 was not done for biological reasons, but it was done in
4 order to provide an impressive total acreage figure when
5 the better bear habitat was deleted from the recovery

6 area. Lemhi County understands the motivation for the
7 economic and special interests involved with the U.S.
8 Fish & Wildlife Service in the formulation of the
9 preferred alternatives recovery area configuration, but
10 points out that this type of planning relationship with
11 the DEIS responsible agency is not proper under NEPA.

18 MR. CHAFFIN: I am Tom Chaffin, Lemhi County
19 Commissioner. This is a continuation of the
20 commissioners' testimony as initiated by Heber Stokes
21 previously.

22 Our Point No. 3, inspite of Lemhi County's
23 repeated requests for involvement and consultation with
24 the U.S. Fish & Wildlife Service in grizzly bear
25 planning, the county was excluded from the special

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1 relationship formulated between the responsible agency
2 and the proponents of the preferred alternative.

3 And as a point of emphasis, I will repeat that
4 the DEIS states that U.S. Fish & Wildlife Service met
5 with all county commissioners in adjacent counties, and
6 the Lemhi County Commissioners have never had a meeting
7 concerning grizzly bear reintroduction with the U.S.
8 Fish & Wildlife Service. Most recently, the EIS
9 coordinator would not accept certified mail from the
10 county containing the Freedom of Information Act
11 requests.

12 Point No. 4, there is failure to develop and
- 13 describe appropriate management programs, which would
- 14 ensure that conflicts are prevented rather than
- 15 responded to after the fact, is a serious deficiency
- 16 with all action alternatives as well as the proposed
- 17 10(J) rule. Merely bringing in bears and monitoring is
- 18 not adequate. If bears are released with the full
- 19 knowledge and certainty that they will move beyond
- 20 federally administered boundaries, then the citizens of
- 21 those affected localities are entitled to effective and
- 22 responsible programs that ensure human protection,
- 23 property protection, and low risk to the animals
- 24 themselves.

25 Point No. 5, the effects on recreational and
- 1 economic activities are not described and evaluated in
- 2 realistic or probable terms. The notion that
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3 restrictions or requirements on human activities, or
- 4 restrictions on human activities such as hunting,
- 5 boating, camping and so on or resource use programs such
- 6 as grazing, roads, logging, et cetera, will vary by
- 7 action alternative is contrary to logic. If bears are
8 present and some program or activity is perceived as
9 detrimental under one alternative, it would certainly be
10 so perceived under another. The residents of Lemhi
11 County are entitled to full and accurate disclosure of
12 the effects of the alternatives on their livelihood and
13 recreational pursuits.

14 Point No. 6. The DEIS description and
- 15 estimates of economic effects is quite unrealistic. No
- 16 actual responsible analysis of economic costs or
- 17 benefits was performed. The techniques used for
- 18 estimating economic effects with reasonable reliability
- 19 exists and should be applied, and the failure to do so
- 20 is a major NEPA deficiency.

- 21 Point No. 7, future management of grizzlies in
- 22 this area would be extremely expensive. Experience to
- 23 date with the U.S. Fish & Wildlife Service suggests that
- 24 the agency, once the enthusiasm of capturing and
- 25 releasing the animals fades, would seek to place the

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- 1 costs of management on the state. It is irresponsible
- 2 to undertake a high cost program where no guarantee of
- 3 future funding exists. The State of Idaho does not have
- 4 funds available and does not anticipate funds will
- 5 become available for this type of unnecessary program.

- 6 Point No. 8, the 10(J) rule, purporting to
- 7 place management of imported bears in the hands of a
- 8 citizens committee, does not do so. The reality is that
- 9 authority would be retained by the Secretary of the
- 10 Interior, and we can rest assured that he will have our
- 11 best interests in mind. The county questions that the
- 12 secretary can in fact delegate final authority, and if
- 13 that is indeed the case, then the notion of a citizens
- 14 committee is merely a public relations ploy.

- 15 We contend that the U.S. Fish & Wildlife
- 16 Service techniques to assess local public opinion on
- 17 grizzly reintroduction is flawed. Appendix A of the
- 18 DEIS shows 62 percent of locals support introduction.
- 19 This is false. A phone survey conducted by a local
20 radio station reveals that out of 156 respondents, 154

21 opposed introduction, with two supporting, for a ratio
22 of 98.7 percent against.

23 It seems to me that this is actually a social
24 issue rather than biological issue. The perception
25 being that a significant event happening to the people

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1 of Idaho rather than with them. This has a potential to
2 seriously limit the traditional lifestyle of this area.

3 Those of you who will be threatened by these animals
4 should have the loudest voice in this decision.

5 It's interesting to me that if there ever were
- 6 a grizzly in this area, probably the prime food source
- 7 were the salmon runs on the Salmon and Little Fork
- 8 Rivers. With those runs gone now, where will the bear
- 9 turn for a food supply. The biggest food supply on
- 10 these main rivers comes in the summer with our summer
- 11 floaters, something to think about.

12 In closing, the Lemhi Board of County
- 13 Commissioners recommends that the DEIS be withdrawn and
- 14 a revised DEIS be prepared with an additional
- 15 alternative providing for their natural recovery
- 16 utilizing a citizens committee that has clear authority
- 17 that is enforceable.

18 Thank you.